

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Division

UNITED STATES OF AMERICA

v.

KEITH WILLIAM SMITH

Defendant.

UNDER SEAL

Case No. 1:25-MJ-11

**AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Sam D. Shahrani, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") and have been since September 2011. I was first assigned to the FBI's New York Field Office following completion of my training in February 2012. I was assigned to the Cyber Criminal Computer Intrusion squad from approximately October 2012 until April 2019. From April 2019 until November 2022, I was assigned to the Hi-Tech Organized Crime squad at the FBI's Washington, D.C. Field Office ("WFO"), in the Northern Virginia Resident Agency ("NVRA"). Since November 2022, I have been assigned to a Transnational Organized Crime squad at the NVRA. My responsibilities include investigation of organized criminal activity under the Major Theft Program and, specifically, investigations pertaining to auto theft and auto parts theft.

2. As an FBI Special Agent, I am an "investigative or law enforcement officer of the United States," within the meaning of 18 U.S.C. § 2510(7), that is, an officer of the United States empowered by law to conduct investigations of and to make arrests for offenses enumerated in Title 18 and Title 21 of the U.S. Code.

3. During my employment as an FBI Special Agent, I have participated in investigations involving vehicle thefts, interstate transportation of stolen vehicles, and trafficking in motor vehicles and motor vehicle parts. I have specialized training and experience in the areas of motor vehicle thefts, evidence recovery, and the analysis of digital evidence. As part of this training and experience, I have analyzed phone and internet records, participated in the search and seizure of digital accounts, prepared, and sworn out criminal complaints, and participated in the execution of search and arrest warrants.

4. I am submitting this affidavit in support of an arrest warrant and a criminal complaint charging defendant **Keith William Smith** (“SMITH”) with conspiracy to commit interstate transportation of stolen property, in violation of 18 U.S.C. § 371 and § 2314, and conspiracy to sell or receive stolen goods in violation of 18 U.S.C. § 371 and § 2315.

5. The facts and information contained in this affidavit are based upon my personal knowledge of the investigation and information obtained from other state and federal law enforcement officers. All observations not personally made by me were relayed to me by the individuals who made them or are based on my review of reports, documents, and other physical evidence obtained during the course of this investigation. This Affidavit is intended to show merely that there is probable cause for the requested criminal complaint and arrest warrant and does not set forth all of my, or the Government’s, knowledge about this matter. I have not, however, intentionally excluded any information known to me that I believe would defeat a determination of probable cause.

BACKGROUND REGARDING AUTO THEFT OFFENSES

6. A vehicle identification number (“VIN”) is a unique number assigned to a given vehicle at the time of manufacture by the vehicle manufacturer. VIN labels, stickers, or marks are

located in several very visible places on each new car, such as the inside of the driver's side door and on the dashboard just inside the front driver's-side windshield. VINs are also typically affixed to major components such as the engine and transmission. VINs are also etched, imprinted, or otherwise applied in concealed or non-obvious locations in a vehicle.

7. When a car is reported stolen, its license plates and its VIN are typically entered by law enforcement into a National Crime Information Center ("NCIC") database. Law enforcement officers typically run the license plate number and/or VIN of vehicles through the database to determine whether a vehicle has been reported stolen. An officer who recovers or encounters a stolen vehicle can find out from the NCIC system the jurisdiction that received the theft report, the date on which the vehicle was reported stolen, and a description of the stolen vehicle.

8. In certain cases, the license plate or VIN for a stolen vehicle may be affixed to a vehicle that does not match the description of the stolen vehicle, or there may be multiple different VINs located in different areas of one vehicle, which is not normal and may indicate the vehicle is stolen or contains stolen parts. Depending on where the VIN was located, it may also indicate that the vehicle is comprised of multiple parts from other vehicles, which may themselves have been stolen, for instance the motor or transmission of one vehicle being placed into the body of another vehicle.

9. In addition to VINs, certain vehicle parts have serial numbers or other identifying numbers affixed to them that can allow the parts to be traced back to individual vehicles via their assigned VIN. Airbags are one of these vehicle parts.

10. Based on my training and experience I am aware that stolen vehicles, and stolen vehicle parts, are frequently moved across state lines in order to facilitate their sale or disposal. For instance, vehicles and vehicle parts may be loaded into shipping containers for transportation

to ports, such as the Port of Baltimore, and then shipped internationally. Stolen vehicles and vehicle parts may also be moved across state lines in order to hamper or evade law enforcement investigations, to facilitate the vehicles or parts being altered to conceal their origins, and to sell the stolen vehicles or items to buyers that may be located in other jurisdictions.

PROBABLE CAUSE

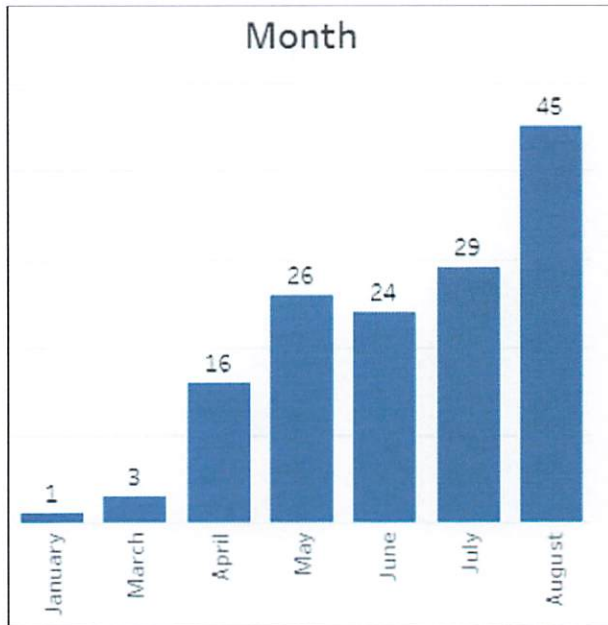
11. Since approximately November 2022, the Washington Field Office of the FBI has been investigating individuals and groups involved in the theft, transport, dismantlement, and/or shipping of stolen vehicles in the Washington, D.C., Maryland, and Virginia (“DMV”) area. These investigations have so far identified multiple individuals that appear to be involved in different aspects of the auto theft ecosystem. The FBI has also been conducting liaison work with local and state law enforcement in the DMV area to build a more comprehensive understanding of the problem and to enhance the effectiveness of local, state, and federal investigations into these matters.

12. One subject suspected to be involved in airbag theft across the DMV is Yuchen ZHANG (“ZHANG”). ZHANG was prosecuted in the Eastern District of Virginia for wire fraud in 2020 in Case No. 1:20-CR-226. ZHANG was incarcerated with the Bureau of Prisons (“BOP”) from January 28, 2021, through June 24, 2021, and then transferred into the custody of Immigration and Custody Enforcement (“ICE”) until he was released on or about October 22, 2021.

13. ZHANG was arrested on November 13, 2022, by Arlington County Police Department (“ACPD”) officers investigating recently reported car break-ins. ZHANG was driving a vehicle accompanied by Adisorn DAMRONGCHAI (“DAMRONGCHAI”), who was in the front in the passenger seat. Recovered during that traffic stop were six stolen airbags. ZHANG and

DAMRONGCHAI were both arrested by ACPD and ZHANG remained incarcerated until February 16, 2024.

14. On or about September 5, 2024, your affiant was notified of a Fairfax County Police Department (“FCPD”) investigation into a series of airbag thefts occurring in their jurisdiction. The airbag thefts appeared to be focused on Honda vehicles and were occurring during the night or early morning. A review of FCPD records revealed a major increase in reported airbag thefts in FCPD’s jurisdiction after ZHANG’s release from prison in February 2024, as shown in the chart below created by FCPD:



15. A subsequent parallel investigation by FCPD and the FBI identified ZHANG and DAMRONGCHAI as suspects in multiple airbag thefts in northern Virginia and southern Maryland. FBI surveillance on the night of October 3, 2024, into the morning of October 4, 2024, identified a vehicle driven by ZHANG with DAMRONGCHAI as a passenger visiting multiple locations where airbag thefts were subsequently identified as occurring during that same timeframe.

16. On October 4, 2024, shortly after ZHANG dropped DAMRONGCHAI off at DAMRONGCHAI's residence, five federal search warrants issued in the Eastern District of Virginia were executed in and around an apartment associated with ZHANG in Alexandria, Virginia. These federal search warrants, along with a Commonwealth of Virginia search warrant executed at DAMRONGCHAI's residence later on October 4, 2024, recovered approximately 16 airbags, some of which were directly tied to vehicles broken into overnight on October 3, 2024, and the morning of October 4, 2024. ZHANG and DAMRONGCHAI were subsequently arrested on Commonwealth of Virginia charges by FCPD.

17. During a video and audio recorded post-arrest, post-*Miranda* interview of ZHANG that took place on October 4, 2024, after ZHANG's Commonwealth of Virginia arrest, ZHANG identified the buyer of the airbags ZHANG stole as Keith William SMITH, whom ZHANG knew as "KEITH." ZHANG identified a Maryland DMV photograph of SMITH as "KEITH," ZHANG's airbag buyer.

18. According to ZHANG, ZHANG had been using SMITH as an airbag buyer since 2022. SMITH had been ZHANG's only airbag buyer, and ZHANG originally found SMITH after looking for airbag sellers on EBAY. ZHANG messaged SMITH, who then sent ZHANG SMITH's phone number via the EBAY messaging service.

19. ZHANG would send text messages to SMITH to set up purchases as well as make voice calls to SMITH. ZHANG described how SMITH's phone number was listed in ZHANG's phone, and subsequent forensic examination of ZHANG's phone identified a phone number of 410-808-6871 (the "-6871 number"). ZHANG indicated that SMITH used the same phone number in both 2022 and 2024.

20. Records provided by T-Mobile show that the -6871 phone is registered to SMITH. A search of ZHANG's cell phone recovered during the warrant execution on October 4, 2024, revealed text messages exchanged with the -6871 number regarding what appears to be the sale and purchase of airbags and the arranging of meeting locations. ZHANG and SMITH also appear to discuss methods of payment.

21. ZHANG indicated that he was typically paid by SMITH via cash or check. Records subsequently obtained from Wells Fargo revealed that SMITH wrote checks to both ZHANG and DAMRONGCHAI, as well as a woman believed to be DAMRONGCHAI's wife, since at least late 2022 and up to and including September 2024.

22. Review of the checks from SMITH to ZHANG and DAMRONGCHAI, as well as to a woman believed to be DAMRONGCHAI's wife, show that the comment fields for these payments usually read "auto parts" or a variation thereof; most recently the check comments stated "Auto parts headlights" or used similar language. No mention of airbags was observed on the checks, and ZHANG told investigators that he only ever sold airbags to SMITH.

23. According to an analysis conducted by an FBI Forensic Accountant, payments from SMITH to ZHANG, including known check, wire, and ZELLE payments, total slightly more than \$37,000. Payments from SMITH to DAMRONGCHAI and the individual believed to be DAMRONGCHAI's wife, including total known check, wire, and Zelle payments, total approximately \$47,700. For example, on August 26, 2024, SMITH paid ZHANG \$1,320 for airbags that ZHANG stole in Virginia and transported to Maryland to sell to SMITH.

24. ZHANG indicated that ZHANG and DAMRONGCHAI had been stealing airbags together in 2022 up to their arrest by Arlington County Police Department. ZHANG would take the airbags to SMITH in Maryland and would meet SMITH either at a Starbucks or a nearby UPS

store which was located across the street from the Starbucks in a shopping center. ZHANG would then split the payments from SMITH evenly with DAMRONGCHAI. ZHANG also introduced DAMRONGCHAI to SMITH.

25. DAMRONGCHAI and ZHANG were mostly stealing airbags independently of each other in 2024, but worked together to steal airbags at least three times, including stealing airbags from the parking lot of ZHANG's apartment complex in Alexandria where the Federal warrants were served on October 4, 2024. DAMRONGCHAI told ZHANG that SMITH sometimes also came down to Virginia to buy airbags from DAMRONGCHAI. ZHANG estimated that in 2022 and in 2024 he was stealing five to 10 airbags every two weeks, and ZHANG assumed that DAMRONGCHAI was doing about the same.

26. ZHANG indicated that SMITH would ship his airbags from the UPS store where ZHANG and SMITH would meet. SMITH would also tell ZHANG at the end of each meeting what airbags SMITH wanted for the next meeting, for example saying that SMITH wanted 10 Honda Civics.

27. ZHANG also stated that he told SMITH that ZHANG found a tracking device on his car and that ZHANG believed it was the police that had placed it. SMITH's reaction was to suggest that ZHANG and SMITH needed to conduct their exchanges of money for airbags faster. SMITH told ZHANG to download an app that would let ZHANG find Bluetooth tracking devices. These events occurred in 2024, approximately one month prior to the search warrant execution at ZHANG's residence.

28. ZHANG assumed that SMITH lived relatively close to the meeting locations because once, when ZHANG was about an hour early, ZHANG messaged SMITH and SMITH arrived at the meeting location in about 10 minutes.

29. ZHANG indicated he never took identifying labels off the airbags ZHANG stole, but that DAMRONGCHAI had started removing identifying labels from the airbags DAMRONGCHAI stole in 2024.

30. ZHANG described SMITH's vehicle as looking like a police vehicle. The vehicle was described as a silver Chevrolet Tahoe SUV with a spotlight on the front driver side. ZHANG did not recall a license plate or state. SMITH was always alone when meeting with ZHANG. SMITH also told ZHANG that SMITH had started his own website selling airbags, but ZHANG did not know the name of the website.

31. On October 23, 2024, the Honorable United States Magistrate Judge William E. Fitzpatrick of the Eastern District of Virginia issued arrest warrants for ZHANG and DAMRONGCHAI based on a complaint and affidavit from your affiant. ZHANG was subsequently arrested on October 28, 2024 and appeared before an EDVA magistrate that same day. After a Preliminary Hearing, ZHANG was ordered remanded to the custody of the United States Marshals Service.

32. DAMRONGCHAI is currently held at the Fairfax County Detention Center on Commonwealth of Virginia charges from Fairfax County and a detainer from Arlington County pending DAMRONGCHAI's sentencing in the November 2022 Arlington airbag thefts. A detainer has been lodged with the Fairfax County Sheriff's for DAMRONGCHAI's federal warrant and DAMRONGCHAI's arrest and appearance in the Eastern District of Virginia is pending.

Investigation of SMITH

33. As part of their investigation of ZHANG and DAMRONGCHAI, Fairfax County Police Department Detectives obtained and served Commonwealth of Virginia legal process for the tracking of cell phones belonging to ZHANG and DAMRONGCHAI. Review of the tracking

information revealed that ZHANG and DAMRONGCHAI appeared to regularly travel to the vicinity of the intersection of Montpelier Rd and Johns Hopkins Road in Laurel, Maryland.

34. Surveillance by FCPD, as well as review of publicly available mapping services by your affiant and physical checks of the location, revealed that there is a Starbucks located at the southwest corner of the intersection of Montpelier Rd and Johns Hopkins Road, with an address of 10985 Johns Hopkins Rd, Laurel, MD, 20723. There is also a UPS Store located at the northeast corner of the intersection at 7500 Montpelier Rd, Suite 105, Laurel, MD 20723. Review of Maryland DMV records showed that SMITH's residence, located in Fulton, Maryland, was approximately two miles, or an approximately five-minute drive, from these locations.

35. Records provided by EBAY associate SMITH with the following eBay user IDs:

- a. Airbaggy, registered November 8, 2016, e-mail address usedautoparts@yahoo.com;
- b. Airbaggy1, registered August 30, 2017, e-mail address brice17@yahoo.com; and
- c. Used.autoparts, registered November 14, 2000, e-mail address brice17@yahoo.com

36. All three of these accounts list a "Street Address" and/or "Shipping Address" of the SMITH residence. All three accounts list a "Day Phone" of the -6871 number.

37. A search of the EBAY Find Member function¹ for "used.autoparts" links to a profile under that name. Clicking on the "used.autoparts" username then redirects to an EBAY store under the name "brice017." That shop lists, as of November 20, 2024, more than 23,000 items sold and 98% positive feedback. Five-hundred and twenty-six items were listed for sale. The background

¹ Available at <https://pages.ebay.com/services/forum/feedback-login.html>.

of many of the displayed images showed a piece of paper with the name “Maryland Used Auto Parts” on it.

38. A search of the EBAY Find Member function for “airbaggy” links to a profile under that name. The profile currently appears inactive but lists 4,300 items sold.

39. A search of the EBAY Find Member function for “airbaggy1” links to a profile under that name. The profile currently appears inactive but lists 136 items sold with 100% positive feedback.

40. Open source research by a Fairfax County Police Department detective identified a website, www.usedairbags.com. Comparison of the listing images on www.usedairbags.com and the listing images for the EBAY seller “used.autoparts” show a number of similarities in style, presentation, handwriting on signs, and photo backdrops that suggest a link between www.usedairbags.com and the EBAY “used.autoparts” store.

41. In addition, review of the “Contact” section of www.usedautoparts.com reveals that the operator of the website can be reached at “usedautoparts@yahoo.com,” the same e-mail address associated with the EBAY UserID “airbaggy” which is in SMITH’s name and lists the SMITH residence as a mailing address.

42. A search of ZHANG’s iPhone pursuant to the search warrant at his apartment revealed that there was a screen-captured image of the www.usedairbags.com website present on the device. The image was dated May 30, 2024 at 3:16:49pm UTC +00.

Surveillance of SMITH

43. The FBI has been conducting physical surveillance of SMITH since approximately October 14, 2024. The surveillance teams have repeatedly observed SMITH loading packages into a silver Chevrolet Tahoe with a front driver side mounted spotlight at SMITH’s residence,

departing SMITH's residence, driving directly to the Montpelier UPS store, and unloading packages. This activity has been observed from at least October 15, 2024, through as recently as November 18, 2024, as captured in the below surveillance photograph:



44. Many of the packages dropped off by SMITH display an orange circular sticker that is associated with EBAY. The vehicle driven by SMITH, and registered in SMITH's name in Maryland, is consistent with the description of "KEITH's" vehicle by ZHANG.

45. SMITH has been observed picking up packages from the UPS store and then driving directly back to SMITH's residence.

46. Surveillance has also observed SMITH travelling to several Pick Your Part locations in Maryland and obtaining various vehicle parts, as well as wearing a T-shirt associated with Pick Your Part.

CONCLUSION

47. I submit that this affidavit supports probable cause to believe that, within the Eastern District of Virginia and elsewhere, defendant **Keith William Smith** did knowingly and unlawfully conspire to commit interstate transportation of stolen property, in violation of 18 U.S.C. § 371 and § 231 as well as knowingly and unlawfully conspiring to sell or receive stolen goods in violation of 18 U.S.C. § 371 and § 2315.

Respectfully submitted,

SAM
SHAHrani

Digitally signed by SAM
SHAHrani
Date: 2025.01.02 16:22:52
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Sam D. Shahrani
Special Agent
Federal Bureau of Investigation

Attested to by the applicant in accordance
with the requirements of Fed. R. Crim. P. 4.1
by telephone on January 6, 2025.

The Honorable Lindsey R. Vaala
United States Magistrate Judge